



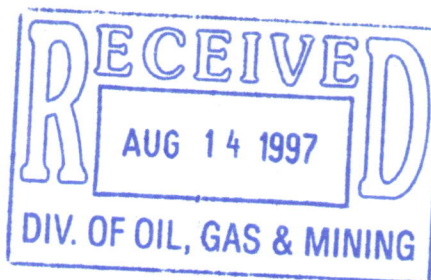
State of Utah

DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR QUALITY

PS FILE
M023/003

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August 6, 1997

DAQE-721-97

D. Wayne Hedberg
Division of Oil, Gas and Mining
355 West North Temple, Suite 350
Salt Lake City, Utah 84180-1203

Dear Mr. Hedberg:

Re: Brush Wellman Incorporated, Hogs Back Project in Juab County, Utah

The Utah Department of Environmental Quality, Division of Air Quality (DAQ) reviewed your State Action dated June 20, 1997, for any potential impacts upon air quality from the Hogs Back mining operation in Juab County, Utah.

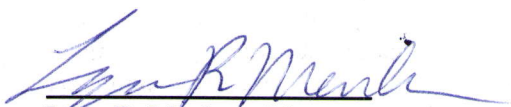
The description of the project includes drilling and blasting of waste rock after topsoil is removed and stockpiled. The waste rock will be loaded into trucks and hauled to the waste rock dump by a mining contractor. Any residual waste rock will be removed by Brush Wellman in 1998 when ore is scheduled to be mined. Bertrandite ore will be stored in a stockpile on top of the waste rock dump. The ore will be blended, sorted and sampled at the mine site, before shipping to Brush Wellman's existing mill near Delta, Utah.

If there is no crushing and screening done during this process, the mining project falls under the Utah mining activities rule found in R307-12-5 of the Utah Air Conservation Rules. This rule requires that fugitive dust emissions must be minimized as an integral part of site preparation, mining activities, and reclamation operations. Examples of fugitive dust control measures that may be used are included in the rule. The types of fugitive dust controls which will be used on site should be determined and formalized into a dust control plan. This plan is to be submitted and approved by DAQ.

If the process includes crushing and screening, an Approval Order (AO) is required before installation, construction, or operation can occur. If the sampling of the ore involves laboratory analysis at the site, an AO may be required for the various chemical emissions. In addition, a modification to Brush Wellman, Incorporated's AO covering the existing mill near Delta, Utah, will be required if the production limits will be exceeded by processing this material.

If you have any questions on this matter, please contact Carol Nielsen at (801) 536-4073.

Sincerely,


Lynn R. Menlove, Manager
New Source Review Section

LRM:CN:dn

